

Exhibit B

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

FLETCHER'S ORIGINAL STATE
FAIR CORNY DOGS, LLC,

Plaintiff,

V.

FLETCHER-WARNER HOLDINGS LLC,
VICTORIA JACE FLETCHER
CHRISTENSEN,
VICTORIA WARNER FLETCHER, and
FLETCH TECHNOLOGY, LLC,

Defendants.

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Civil Action No. 4:19-cv-00681-SDJ

DECLARATION OF STEVEN E. ROSS

I, Steven E. Ross, hereby declare the following:

1. I am over twenty-one years of age, of sound mind, and fully capable of making this declaration. I am an attorney admitted to practice in the State of Texas and before this Court. I am lead counsel for Plaintiff Fletcher's Original State Fair Corny Dogs, LLC ("Fletcher's") in the above-captioned matter. I could testify competently to the matters stated herein if called upon to do so. Red arrows have been added to some of the attached exhibits to highlight relevant portions.

2. Attached hereto as Exhibit B1 is a true and correct copy of the Agreed Permanent Injunction (Dkt #140) entered by the Court in this action on December 23, 2020.

3. Attached hereto as Exhibit B2 are true and correct screenshots I captured on March 15, 2022, of portions of the “Corn Dog With No Name” Internet website at <https://www.corndogwithnoname.com/>.

4. Attached hereto as Exhibit B3 is a true and correct screenshot I captured on March 15, 2022, showing a portion of the html code of the “Corn Dog With No Name” website at view-source:<https://www.corndogwithnname.com>.

5. Attached hereto as Exhibit B4 are true and correct screenshots I captured on March 15, 2022, showing portions of the “Corn Dog With No Name” social media accounts.

6. Attached hereto as Exhibit B5 is a true and correct screenshot I captured on March 15, 2022, showing the Google profile for “Corn Dog With No Name.”

7. Attached hereto as Exhibit B6 is a true and correct screenshot I captured on March 15, 2022, showing the Yelp profile for “Corn Dog With No Name.”

8. Attached hereto as Exhibit B7 is a true and correct screenshot I captured on March 15, 2022, showing a “Corn Dog With No Name” Facebook post dated December 14, 2021.

9. Attached hereto as Exhibit B8 are true and correct screenshots I captured on March 7, 2022, showing “Victoria Jace Fletcher” Facebook posts dated January 22, 2021; February 2, 2022; and February 11, 2022.

10. Attached hereto as Exhibit B9 is a true and correct photograph I took on January 18, 2022, showing the front of the “Corn Dog With No Name” restaurant located at 6030 Luther Lane, Dallas, Texas 75225.

11. Attached hereto as Exhibit B10 is a true and correct screenshot I captured on January 18, 2022, showing a “Corn Dog With No Name” Facebook post dated November 25, 2021.

12. Attached hereto as Exhibit B11 is a true and correct screenshot I captured on June 23, 2021, showing a “Corn Dog With No Name” Instagram post.

13. Attached hereto as Exhibit B12 are true and correct screenshots I captured on March 21, 2022, showing portions of the Internet page advertising the 2022 Fort Worth Main Street Arts Festival at <https://www.mainstreetartsfest.org/experience-main-st/culinary-arts/> .

14. Attached hereto as Exhibit B13 are true and correct screenshots I captured on January 18, 2022, showing portions of the Thornbury Capital Advisors website at <http://thornburycapital.com/about/> .

15. Attached hereto as Exhibit B14 are true and correct copies of records regarding Fletcher-Warner Holdings LLC that I downloaded on April 14, 2022, from the Texas Secretary of State's online database.

16. Attached hereto as Exhibit B15 are true and correct copies of records regarding Fletch Technology, LLC that I downloaded on April 14, 2022, from the Texas Secretary of State's online database.

17. Attached hereto as Exhibit B16 are true and correct screenshots I captured on March 31, 2022, showing "Corn Dog With No Name" Facebook posts dated March 7, 2022; October 14, 2021; October 8, 2021; September 24, 2021; September 12, 2021; July 12, 2021; and June 2, 2021.

18. Attached hereto as Exhibit B17 are true and correct screenshots I captured on March 31, 2022, showing "Corn Dog With No Name" Instagram posts dated March 7, 2022; December 14, 2021; December 7, 2021; September 30, 2021; September 12, 2021; and May 26, 2021.

19. Attached hereto as Exhibit B18 is a true and correct screenshot I captured on March 19, 2022, showing a Google review of "Corn Dog With No Name."

20. Attached hereto as Exhibit B19 are true and correct screenshots I captured on March 19, 2022, showing Yelp reviews of "Corn Dog With No Name."

21. Attached hereto as Exhibit B20 are true and correct screenshots I captured on April 1, 2022, showing posts made on the Rivals.com “Orangebloods” fan forum.

22. Attached hereto as Exhibit B21 are true and correct screenshots I captured on March 21, 2022, showing a post dated February 3, 2022, on Jason Helal’s Facebook page.

23. Attached hereto as Exhibit B22 is a true and correct screenshot I captured on March 19, 2021, showing a post dated March 9, 2021, on the “Beyond Beautiful, Dr. Vu Ho,” Facebook page.

24. Attached hereto as Exhibit B23 is a true and correct screenshot I captured on January 17, 2022, showing a post dated December 22, 2021, “dallasfunandyum” Instagram page.

25. Attached hereto as Exhibit B24 are true and correct screenshots I captured on April 5, 2022, using the “Wayback Machine” of the Internet Archive showing portions of the “Corn Dog With No Name” website on September 28, 2020.

26. Attached hereto as Exhibit B25 is a true and correct screenshot I captured on April 5, 2022, using the “Wayback Machine” of the Internet Archive showing portions of the Thornbury Capital Advisors website on June 6, 2019.

27. Attached hereto as Exhibit B26 is a true and correct screenshot I captured on April 14, 2022, showing a post dated September 3, 2021, on Sarah White’s Facebook page.

28. Attached hereto as Exhibit B27 is a true and correct copy of the transcript of the July 13, 2020, hearing in this action.

29. Attached hereto as Exhibit B28 is a true and correct copy of the [REDACTED]

[REDACTED]

[REDACTED]

30. Attached hereto as Exhibit B29 is a true and correct copy of the letter (without attachments) I sent to the FWH Parties' counsel, Mr. Brandon Renken, on February 10, 2021.

31. Attached hereto as Exhibit B30 is a true and correct copy of the letter I received from the FWH Parties counsel, Mr. Brandon Renken, on February 18, 2021.

32. Attached hereto as Exhibit B31 is a true and correct copy of the letter I sent to the FWH Parties' counsel, Mr. Brandon Renken, on December 10, 2021.

33. Attached hereto as Exhibit B32 is a true and correct copy of the letter I received from the FWH Parties counsel, Mr. Brandon Renken, on December 17, 2021.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 14th day of April, 2022, in Dallas, Texas.



Steven E. Ross